

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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LIBERTY MUTUAL INSURANCE COMPANY,  
et al.

Docket No.: CV 11-05780 (JBW) (RLM)

Plaintiffs,

-against-

**STIPULATION**

EXCEL IMAGING, P.C., et al.,

Defendants.

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IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for plaintiffs, Liberty Mutual Insurance Company, Liberty Mutual Fire Insurance Company, Liberty Insurance Corporation, The First Liberty Insurance Corporation, LM Insurance Corporation, Liberty Mutual Mid-Atlantic Insurance Company, Liberty County Mutual Insurance Company, and LM Property and Casualty Insurance Company (collectively, "Plaintiffs") and defendants, Mark D. Freilich, M.D., Faisal Abdus Sami, M.D., Tariq R. Khan, M.D., Pervez Iqbal Qureshi, M.D., Naiyer Imam, M.D., Afzal M. Amanat, Mohammed Shafkat Ilahi, Claimnet L.L.C., Amaar Holdings Inc., and Excel Imaging, P.C. (collectively, "Defendants"), as follows:

1. The summary judgment aspect of Defendants' pending motions to dismiss, which were converted by the Court to summary judgment motions, will be limited to issues concerning the statute of limitations and the request to compel arbitration of this matter.

2. The parties will file supplemental submissions in connection with Defendants' pending motions, limited to addressing the issues concerning the statute of limitations and the request to compel arbitration of this matter.

3. The parties will not pursue discovery in connection with Defendants' pending motions, but reserve all rights to seek discovery in connection with any other aspect of this case and/or in connection with any future proceedings.

4. Plaintiffs' supplemental papers in opposition to Defendants' pending motions for summary judgment shall be filed by May 21, 2012, and Defendants' supplemental/reply papers in further support of Defendants' pending motions shall be filed by June 8, 2012.

(Judge Weinstein)  
5. The Court will conduct oral argument on Defendants' pending motions on June 13, 2012, at 10:00 A.M., as per Judge Weinstein's Order dated May 9, 2012.

6. This stipulation may be filed without further notice with the Clerk of the Court. A copy of this stipulation and signatures herein shall be deemed as effective as the original.

DATED: Uniondale, New York  
May 3, 2012

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Ilahi, Claimnet L.L.C., Amaar Holdings Inc.,  
and Excel Imaging, P.C.*

**SO ORDERED:**

**SO ORDERED:**

/s/

Roanne L. Mann

U.S. Magistrate Judge

Dated: 5/15/12

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Hon. Jack B. Weinstein, U.S.D.C.